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13 *Michele Ewing and*
14 *Michelle Clay*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 BENJAMIN ESPINOSA,

18 Plaintiff,

19 vs.

20 FILSON, et al.,

21 Defendant.

22 Case No. 3:18-cv-00298-MMD-CBC

23 **DEFENDANTS' MOTION FOR EXTENSION
24 OF TIME TO OPPOSE MOTIONS FILED
25 DURING THE STAY**

26 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendants Michele Ewing and Michelle Clay, by and
27 through counsel, Adam Paul Laxalt, Nevada Attorney General, and Robert W. DeLong, Deputy
28 Attorney General, hereby move to extend the deadline to file Oppositions to (1) Plaintiff's Motion for
Leave to Amend 42 U.S.C. § 1983 Complaint (ECF No. 25), (2) Plaintiff's Motion to Extend Prison
Copy Work Limit for Federal 42 U.S.C. § 1983 Action (ECF No. 26), and (3) Plaintiff's Motion to
Appoint Counsel (ECF No. 27) for an additional 14 days. Defendants calculate that Oppositions to
these motions are presently due on December 28, 2018.

29 Defendants seek an additional 14 days, until January 11, 2018, to file oppositions because
30 undersigned counsel has been out for family medical leave on December 24th and 26th, and will also be
31 out on December 28th (the current opposition deadline) for family medical leave. This request is made
32 in good faith and not for the purpose of delay. Defendants note that Plaintiff has recently filed a motion
33 to stay these proceedings and to consolidate this action with another matter. (ECF No. 37 & 38.)

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The Defendants respectfully submit that none of the parties will be prejudiced by the extension of time sought.

DATED this 27th day of December, 2018.

ADAM PAUL LAXALT
Attorney General

By: Robert W. DeLong
ROBERT W. DELONG
Deputy Attorney General
State of Nevada
Bureau of Litigation
Public Safety Division

IT IS SO ORDERED

U.S. MAGISTRATE JUDGE

DATED: 1/7/2019

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that
3 on this 27th day of December, 2018, I caused to be served, a true and correct copy of the foregoing,
4 **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO OPPOSE MOTIONS FILED**
5 **DURING THE STAY**, by U.S. District Court CM/ECF Electronic Filing on:

6 Benjamin Espinosa #74296
7 Northern Nevada Correctional Center
8 C/O NNCC Law Librarian
P.O. Box 7000
Carson City, NV 89702
9 lawlibrary@doc.nv.gov

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11 An employee of the
12 Office of the Attorney General

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